

REMARKS

Applicants respectfully request favorable reconsideration of this application, as amended.

By this Amendment, independent Claims 7 and 14 have been amended to address the alleged 35 U.S.C. § 112, first paragraph, issues and to correct minor typographical errors. Claim 12 has been amended to eliminate potential antecedent basis issues. Claims 1-6, 9, 13 and 15-17 were previously cancelled without prejudice or disclaimer. Accordingly, Claims 7, 8, 10-12, 14, and 18-22 are pending.

In the Office Action, Claims 7-8, 10-12, 14, and 18-19 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,751,677 to Ilnicki (“*Ilnicki*”) in view of U.S. Patent No. 6,981,265 to Rees (“*Rees*”), and under 35 U.S.C. §112 (first paragraph) as allegedly failing to comply with the written description requirement. Applicants respectfully traverse these rejections.

The rejection under 35 U.S.C. §112 (first paragraph) is moot in view of the amendments made to the Claims.

Regarding the art-based rejection, it is apparent that none of the references teaches or suggests the features of independent Claims 7 and 14.

Claim 7 recites a method for allowing a client application to establish a first connection at a first security level with a first port of a server application hosted in a server machine linked to server comprising, *inter alia*, generating, in a gateway machine, a thread which establishes said first connection and generating a second connection at a second security level between the gateway machine and a third port of the server application, the third port being configured to receive at least one message at a second security level from the gateway machine via second connection.

It is apparent that neither Ilnicki nor Rees teaches or suggests these features. The Office Action relies on Col. 8, lines 46-57 of Ilnicki as allegedly disclosing “generating, in the gateway machine, a thread which establishes said first connection at a first security level with the first port of the server application, and generating a second connection at a second security level between the gateway machine and a third port of the server application.” Applicants respectfully disagree. In contrast, the cited portion of Ilnicki fails to disclose generating a thread which establishes a first connection at a first security level with the first port of the server application, and fails to disclose generating a second connection at a second security level between the gateway machine and a third port of the server machine.

For example, the cited portion of Ilnicki describes establishing a connection between the gateway 33 and a port (e.g., first port) of the target server to authenticate the target server, as well as trying to establish a connection between the gateway 33 and the target server using a different TCP/IP connection if the target server cannot be authenticated. Thus, in Ilnicki, the only time a second connection is generated is when the first connection failed to be established. As such, even assuming *arguendo* that Ilnicki’s gateway 33 could establish a different connection with a different port of the target server, that connection is generated only if the first connection failed.

Therefore, there is no teaching or suggestion in Ilnicki of generating a thread which establishes a first connection with a first port of the server application **and** generating a second connection at a second security level between the gateway machine and a third port of the server application, as recited in Claim 7.

Additionally, although the Office Action acknowledges that Ilnicki fails to indicate that the gateway server establishes a second connection with a third port of the server application, rather than a first port, the Office Action further alleges that

Rees remedies this deficiency in Ilnicki. In particular, the Office Action interprets Rees as teaching that messages forwarded to port 1 of a port inside the network can be forwarded to a different port inside the network by the gateway (see page 6 of the Office Action). However, even if Rees is interpreted as suggested by the Office Action, whether or not a gateway can forward a message sent to a first port inside a network to a different (e.g., third) port inside the network has no bearing on whether a gateway establishes two separate connections, one with a first port of the server application at a first security level and a second connection with a third port of the server application at a second security level, as recited in Claim 7.

Therefore, secondary reference Rees fails to remedy the deficiencies of Ilnicki.

Accordingly, Applicants respectfully submit that Claim 7 distinguishes patentably from Ilnicki and Rees whether taken alone or in combination.

Claim 14 also recites, *inter alia*, generating, in a gateway machine, a thread which establishes said first connection and generating a second connection at a second security level between the gateway machine and a third port of the server application, the third port being configured to receive at least one message at a second security level from the gateway machine via second connection.

Therefore, Applicants respectfully submit that independent Claim 14 distinguishes patentably from the applied references for at least the reasons discussed above with respect to Claim 7.

The remaining claims are also believed to be patentable due to their respective dependence from independent Claims 7 and 14, as well as for the additional features recited in the remaining claims.

In view of the foregoing, Applicants respectfully submit that this application is in condition for allowance. A Notice of Allowance is respectfully requested.

The Commissioner is hereby authorized to charge to Deposit Account No. 50-1165 (T2147-907461) any fees under 37 C.F.R. §§ 1.16 and 1.17 that may be required by this paper and to credit any overpayment to that Account. If any extension of time is required in connection with the filing of this paper and has not been separately requested, such extension is hereby requested.

Respectfully submitted,

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